

NOTICE OF VIOLATION

Carolina Power and Light Company  
H. B. Robinson Unit 2

Docket No. 50-261  
License No. DPR-23

During an NRC inspection conducted from August 18 through September 28, 1996, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

- A. Technical Specification 6.5.1.1.1, Procedures, Tests, and Experiments, states that written procedures shall be established, implemented and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Rev. 2, February 1978, including procedures for performing and controlling maintenance on safety related equipment and emergency procedures.

Plant Procedure, PLP-047, Foreign Material Exclusion Area Program, rev. 8, provides administrative instructions for ensuring the exclusion of foreign material from plant systems and equipment. The procedure requires that supervisors for work involving a foreign material exclusion area (FMEA) be responsible for ensuring that FMEA controls are maintained.

Engineering Service Request modification, ESR 95-00764, provided installation instructions for replacing the power cable to valve SI-866A, the Safety Injection (SI) Pump Discharge Hot Leg Injection to Loop 3. Step 16.1 through 16.4 of the instructions require authorization from operations personnel to start work and implementation of clearances (i.e., tagout) prior to performing step 16.5 for de-terminating the power cable to valve SI-866A.

Emergency Procedure, EPRAD-03, Dose Projections, rev. 0, provides instructions for the Control Room operators to perform off-site dose projection calculations in case of possible emergencies from a release of radioactive material. Step 1.1.8 of the procedure provides instructions for accessing the computer program for calculating off-site dose projections via backup methods in case the primary access method, through the Emergency Response Facility Information System (ERFIS) computer system, was not available.

Contrary to the above:

1. Between September 17-19, 1996, the operations Shift Supervisors assigned to the shifts failed to effectively ensure that FMEA controls were maintained in the Spent Fuel Pool Building while fuel off-load was ongoing. On September 17, fuel handling personnel moved the FMEA boundary without installing boundary tape to delineate the new FMEA or updating the material log for items no longer in the FMEA area. This resulted in a loss of FMEA controls until corrected on September 19, 1996.

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866A, which was still energized at the time, prior to obtaining operations permission to start work or obtaining clearances for de-energizing the valve.

3. On August 19, 1996, EPRAD-03, was inadequate, in that the off-site dose projection computer program could not be readily accessed from the Control Room using the instructions contained in step 1.1.8 for backup access should ERFIS be unavailable.

This is a Severity Level IV Violation (Supplement I).

- B. 10 CFR 50, Appendix B, Criterion XVI, Corrective Action, requires in part, that measures be established to assure that conditions adverse to quality are promptly identified and corrected including measures to assure that the cause of the condition is determined and corrective action taken to preclude repetition.

Contrary to the above, the licensee's corrective actions to ensure that operator medical examination requirements were maintained current were inadequate to assure recurrence of individuals standing various watch functions with expired examinations. Between August 1-6, 1996, an Auxiliary Operator stood five watches as a Fire Brigade member with an expired examination. Previous to this, between March 2-12, 1996, a licensed senior reactor operator stood seven control room shift supervisor watches with an expired NRC required medical examination, and, between January-February, 1996, two Auxiliary Operators stood 11 watches as Fire Brigade members with expired examinations.

This is a Severity Level IV Violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, Carolina Power and Light Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without

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redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at Atlanta, Georgia  
this 25th day of October 1996